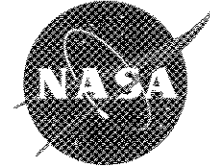


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 15, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Glory Satellite
Pre-Launch Reception hosted by Orbital Sciences Corporation on or about
February 22, 2011

No earlier than February 22, 2011, Orbital Sciences Corporation (Orbital) will host a reception at the Santa Ynez Valley Marriott in Buellton, California from 3:00 PM to 4:30 PM. This event will be a celebration of the launch of the Glory spacecraft.

This event will be a widely-attended gathering of approximately 250 representatives of the aerospace industry, Congress and their staffers, state and local officials, NASA and other Federal agencies, academia, and members of the public. The cost of the event, which includes all food and refreshments, will be approximately \$20.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. The event will provide NASA employees with the opportunity to discuss the Glory spacecraft launch and mission, in addition to other NASA programs, with the other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of event for themselves and any accompanying guest.

Kathleen T. Spier

for Adam F. Greenstone